

Jason B. Nicholas
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August 9, 2016

Hon. Paul G. Gardephe
Hon. J. Paul Oetkin
United States District Judges
Southern District of New York
U.S. Courthouse
40 Foley Square
New York, New York 10007

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SDNY PRO SE OFFICE
2016 AUG 11 AM 11:05
S.D. OF N.Y.

Re: Nicholas v. Bratton, 15-Civ.-9592
Nicholas v. City of New York, 15-Civ.-9896

Dear Judges Gardephe and Oetkin:

Please be advised that the above-captioned cases are potentially related.

Attached is Plaintiff's Related Case Statement.

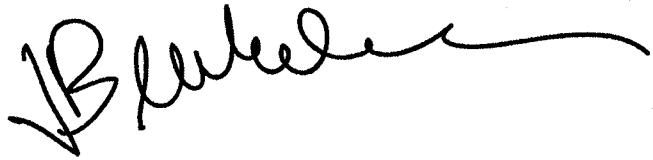
The protential relation is a Monell claim for a custom and practice of interfering with professional and non-professional news-gathering that exists in both cases.

The Court in the first case, Judge Oetkin, 15-Civ.-9592, just granted Plaintiff's motion to file a proposed Amended Complaint that includes the Monell claim, while in the second Judge Gardephe is still considering Plaintiff's motion to file a proposed Amended Complaint, including said Monell claim.

I submit that it would be best to consolidate the Monell news-gathering claim in front of Judge Oetkin, as he had it first and has already issued a decision approving an Amended Complaint with this claim.

Counsel for Defendants has been consulted. We are, at this time, unable to reach consensus on this issue.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JB Nicholas', with a long horizontal flourish extending to the right.

JASON B. NICHOLAS

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IH-32

Rev: 2014-1

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Jason Nicholas

Plaintiff

vs.

city of New York et al.

Defendant

Case Number

9896
15-Cv-~~9592~~

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Jason Nicholas

Plaintiff

vs.

William Bratten

Defendant

Case Number

15-Cv-9592

IH-32

Rev: 2014-1

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

(If so, set forth procedural status and summarize any court rulings.)

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Both cases have Monell claims for an alleged policy and custom that New York City interferes with news gathering

Signature: _____

JB Nicholas

Date: _____

11 Aug. 16

Firm: _____